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Proposed Counsel for Marlene G. Weinstein,  
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION

In re

R AND R MARKETING SERVICES, LLC  
*dba* FLY WITH WINE,  
Debtor.

Case No. 24-10368 WJL  
Chapter 7  
Hon. William J. Lafferty  
[No Hearing Requested]

**DECLARATION OF CHARLES P. MAHER**

I, Charles P. Maher, declare as follows:

1. I am a partner at the law firm Rincon Law, LLP, which the Trustee has proposed to employ as her general counsel in the above case.

2. I am familiar with the names of all existing clients at Rincon Law, LLP and have reviewed that list against the parties identified by the Debtor in its schedules of assets and liabilities and statement of financial affairs.

3. Based on my review, I am informed and believe that there are no conflicts or other connections between Rincon Law, LLP and the Debtor, creditors, other parties in interest, their attorneys or accountants, or the United States Trustee or any person employed in the Office of the United States Trustee.

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1           4.     Rincon Law, LLP has not agreed, and will not agree, to share any of the  
2 compensation it receives in this case with any other person. Any compensation is subject to Court  
3 approval on notice to creditors and other interested parties.

4           5.     Rule 6003(a) of the Federal Rules of Bankruptcy Procedure provides that  
5 professionals should not be employed earlier than 21 days after the petition date absent exigent  
6 circumstances. Exigent circumstances exist in this case. A lease of premises is causing accrual of  
7 administrative rent and the Debtor's filing has disrupted a recent sublease to a third party; the  
8 landlord is willing to terminate the lease. There are other leased premises that are accruing  
9 administrative rent. The Trustee has received an expression of interest in a purchase of assets. Some  
10 assets appear to be over-encumbered and early abandonment may be necessary. The Trustee will  
11 need immediate legal assistance.

12           I declare under penalty of perjury that the above statements are true to the best of my  
13 knowledge and that those matters stated on information and belief are true to the best of my  
14 information and belief. This declaration is executed on the 15<sup>th</sup> day of July 2024 in San Francisco,  
15 California.

16                               /s/Charles P. Maher  
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